

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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IN RE:  
LOCAL TV ADVERTISING ANTITRUST  
LITIGATION

*This Document Relates to All Actions*

MDL No. 2867  
No. 18 C 6785

Honorable Virginia M. Kendall

**ORAL ARGUMENT REQUESTED**

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**DEFENDANT SHAREBUILDERS, INC.'S MOTION TO DISMISS  
CONSOLIDATED THIRD AMENDED ANTITRUST CLASS ACTION COMPLAINT**

Defendant ShareBuilders, Inc. moves to dismiss the Consolidated Third Amended Antitrust Class Action Complaint for failure to state a claim pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. In support of the motion, ShareBuilders, Inc. relies on the accompanying memorandum of law.

WHEREFORE, ShareBuilders, Inc. respectfully requests that this Court grant its motion to dismiss and enter an Order dismissing the claims against it with prejudice.

April 15, 2022

Respectfully submitted,

**HEPLERBROOM LLC**

*/s/ Glenn E. Davis*

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**CERTIFICATE OF SERVICE**

I, Glenn E. Davis, certify that on April 15, 2022, I caused the foregoing Motion to Dismiss to be filed and served on all counsel of record via Court's ECF system.

*/s/ Glenn E. Davis*